

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**IN RE: Harriet E. Salley
Debtor.**

**Case No.: 20-33649-KRH
Chapter 13**

MOTION TO WITHDRAW AS COUNSEL

COMES NOW, Jeanne E. Hovenden, counsel for Harriet E. Salley (“Debtor”) and hereby requests that the Court allow her to withdraw from this representation.

1. On August 29, 2020, the Debtor filed a voluntary petition Under Chapter 13 of the Bankruptcy Code.
2. Multiple plans have been filed in the case, but none have been confirmed due to a series of objections from the Chapter 13 trustee and creditors.
3. There have been things accomplished in the 2 years the case has been pending, including a loan modification on one mortgage and the sale of piece of real property that netted a secured creditor roughly two thirds of its claim.
4. Multiple motions for relief, motions to dismiss, and objections that have prevented plan confirmation have also been filed. Counsel is owed the \$3,484 balance of the “no-look” fee. The Debtor has orally agreed that Counsel has earned the remainder of the “no-look” fee. Counsel asks that the balance of that fee be ordered to be paid to Counsel by the chapter 13 trustee. The trustee is holding sufficient funds to pay the fee and has advised that she has no objection to the fee payment.
5. Counsel and Debtor can no longer communicate effectively in the case.
6. Counsel therefore wishes to resign and allow the Debtor to find other counsel, or to proceed *pro se*.

WHEREFORE, Jeanne E. Hovenden, seeks entry of an order allowing her to withdraw as Counsel for Harriet E. Salley and for the payment of \$3,484 in fees.

Respectively submitted:
Jeanne E. Hovenden, Esq.

/s/Jeanne E. Hovenden, Esq.
Jeanne E. Hovenden, VSB # 37249
Jeanne E. Hovenden, PLLC
P O Box 1839
Chesterfield VA 23832
804-706-1355

CERTIFICATE

I certify that a true copy of the foregoing Motion to withdraw as Counsel was sent by first class mail or electronic transmission to the parties below on October 28, 2022.

/s/ Jeanne E. Hovenden

Jeanne E. Hovenden, Esq.

Label Matrix for local noticing
0422-3
Case 20-33649-KRH
Eastern District of Virginia
Richmond
Mon Jan 10 12:54:33 EST 2022

United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219-1888

Amex/Bankruptcy
Correspondence/Bankruptcy
Po Box 981540
El Paso, TX 79998-1540

Clearwater Pool Service
570 E. Hundred Road
Chester, VA 23836-2617

(p)CREDIT UNION OF RICHMOND
ATTN NANCY ALLISON
1601 OWNBY LANE
RICHMOND VA 23220-1318

Harriet Salley Auto Sales LLC
4009 Mechanicsville Tpke
Richmond, VA 23223-1117

Quantum3 Group LLC as agent for
MOMA Trust LLC
PO Box 788
Kirkland, WA 98083-0788

W. Harold Talley
4905 Radford Ave
Suite 200
Richmond, VA 23230-3525

John P. Fitzgerald, III
Office of the US Trustee - Region 4 -R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219-1849

Fay Servicing, LLC
c/o McCalla Raymer Leibert Pierce, LLC
Bankruptcy Department
1544 Old Alabama Road
Roswell, GA 30076-2102

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

BCMB1 Trust
SN Servicing Corporation
323 5th Street
Eureka, CA 95501-0305

Comenity Bank/Wayfair
Attn: Bankruptcy Dept
Po Box 182125
Columbus, OH 43218-2125

Department Stores National Bank
c/o Quantum3 Group LLC
PO Box 657
Kirkland, WA 98083-0657

Macys (p)
RE: Bankruptcy
P O Box 9001094
Louisville, KY 40290-1094

U.S. Bank Trust National Association et al.
Fay Servicing, LLC
PO Box 814609
Dallas, TX 75381-4609

Harriet E. Salley
4932 Topping Lane
Glen Allen, VA 23060-2405

Suzanne E. Wade
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Richmond, VA 23226-3770

U.S. Bank Trust National Association, not in
BWV Law Group, LLC
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Richmond, VA 23229-4833

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Correspondence/Bankruptcy
Po Box 981540
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Credit Union Of Rich
Po Box 26024
Richmond, VA 23260-6024

Fay Servicing Llc
Attn: Bankruptcy Dept
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Chicago, IL 60680-9441

Navy Federal Credit Union
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Merrifield, VA 22119-3000

USAA Federal Savings Bank
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